Minister's Response

to the

Forest and Range Practices Advisory Council (PAC) Report

on Draft Regulations and FRPA Implementation

February 2, 2004

Preamble

As Minister of Forests, I appointed the Forest and Range Practices Advisory Council (PAC) in the Spring of 2003. The first task I assigned PAC was to review draft regulations in support of the *Forest and Range Practices Act* (FRPA). PAC membership, terms of reference, minutes of meetings, the PAC report to me on this initial task, and this response are posted on the website www.for.gov.bc.ca/code/#pac

Four draft regulations were received by PAC in July 2003 for review and comment as noted in their report. PAC prepared its report in December, 2003 based on its review of the draft regulations. FRPA regulations were approved on January 22, 2004 and are located at www.for.gov.bc.ca/code.

Completion of the Act and regulations benefited from a comprehensive process of public and stakeholder review and comment including:

- Results-based code discussion paper prepared in May 2002 followed by public and stakeholder meetings which are documented at www.resultsbasedcode.ca
- Subsequent bilateral stakeholder processes including ranchers, woodlot operators and forest licensees who will be regulated by FRPA
- Recommendations and comment from PAC with respect to the regulations.

I appreciate the time that PAC has invested to provide me with their thoughtful report. Their report has had a significant influence on the final regulation as several features of the draft regulations of concern to PAC were changed.

Now that PAC has completed its review of the FRPA regulations, I am looking forward to receiving PAC advice on ways to improve our implementation of the Act and regulations (such as through training and monitoring), and where necessary, to improve the legislation. In that regard, PAC has provided several important recommendations on FRPA implementation in their report. In this response I have asked PAC for further assistance on FRPA implementation issues.

Once again, many thanks are extended to all PAC members for their efforts to date.

Honourable Michael de Jong
Minister of Forests

Introductory note
The response below follows the format of the PAC report in terms of recommendation numbers – please refer to PAC report itself first for the recommendation and then the response below.

A. Response to PAC recommendations regarding FRPA regulations

This response reflects how the final regulations where applicable have addressed a PAC concern raised about the July 2003 draft regulations.

A1. Response to PAC recommendation regarding professional reliance

FRPA represents a different approach to professional reliance. The Forest Practices Code specifically noted professional sign-off requirements, whereas under FRPA regime the regulations do not specify that operational plans or site plans need to be signed by resource management professionals. This is because the intent of the legal framework of FRPA is to regulate the relationship between government and licensees, but not the relationship between employers and resource professionals.

FRPA defers to (and does not try to duplicate) other pieces of legislation that address what activities can be done by which professionals. For these reasons, Acts governing resource professionals were recently introduced (*College of Applied Biology Act*) or strengthened (*Foresters Act* and *Agrologists Act*) in order to support FRPA. For example the practice of professional forestry under the *Foresters Act* includes planning of forests, forest lands, forest resources and forest ecosystems.

It is expected therefore that professional foresters will be involved in preparing forest operational plans (such as Forest Stewardship Plans) and Site Plans, and that aspects of those plans will be addressed by other qualified resource professionals (e.g. biologists, engineers, geoscientists, agrologists). In order to better communicate and provide training on the important linkages between FRPA and Acts governing resource professionals, a Professional Reliance Training Module (see description of training modules in point A2 below), has been collaboratively prepared by the various professional associations, and will be available at www.for.gov.bc.ca/code.

A2. Response to PAC recommendation regarding understanding and interpretation

The *Forest Planning and Practices Regulation* has been significantly restructured relative the July 2003 draft in an attempt to improve clarity. For example, all of the objectives set by government enabled under s. 149 of the Act are now consolidated in Part 2 of the regulation whereas the practices requirements have been brought together in Part 4.

Nevertheless, understanding the links between the Act and the regulations can still be confusing. To address this concern, various modules (documents) have been developed to support FRPA training. As recommended by PAC, the training modules are intended to more seamlessly describe requirements under the Act and regulations. The following training modules are, or will soon be, available at www.for.gov.bc.ca/code by accessing the FRPA Training Program:

Forestry modules:	Other modules:
• Overview • Professional Reliance • Planning • Harvesting and Roads • Silviculture Practices • Logging community information	• Range Planning and Practices • Woodlot Planning and Practices • Compliance and Enforcement • Public and other Stakeholders Note: Others may be prepared

A3. Response to PAC recommendation regarding efficiencies and reducing costs

The regulations do not set targets for reducing costs or improving efficiencies. It is expected, however, that costs savings and increased efficiencies will accrue under FRPA and that this will be tracked as part of the FRPA Resource Evaluation Program. The details of how to best do this need to be worked out. PAC will have an opportunity to review and comment on the resource evaluation program to help ensure this concern is appropriately addressed. The FRPA Resource Evaluation Program Charter and related information is accessible at the MOF Forest Practices Branch website: www.for.gov.bc.ca/hfp/pubsmonitoring.htm

The *Forest Planning and Practices Regulation* now addresses notification and reporting in Part 6. I would appreciate any PAC advice on these provisions particularly as we learn about them based on FRPA implementation experience.

A4. Response to PAC recommendation regarding Forest Stewardship Plan content requirement

The *Forest Planning and Practices Regulation* provides a clearer separation between FSP content requirements (Part 2, Div. 2) and approval considerations (Part 2, Div. 4) than existed in the July 2003 draft (where requirements were mixed in one division).

The general intent of FRPA was to reduce plan content and rule requirements that existed in the Forest Practices Code, focusing instead on defining results or strategies to be delivered. This provides licensees with more freedom to manage (and opportunities to be innovative) by deciding themselves how best to prepare plans and deliver results and strategies. It is expected that FSPs will be supported with sufficient information to show how plan approval tests have been met. For example, information is expected to support the results or strategies that show how they are consistent with government objectives.

FRPA and the regulations set up the opportunity for appropriate FSP content. It is important to monitor what kinds of FSPs are prepared under FRPA to assess if the issue of adequate FSP content becomes a concern or not. If a real concern surfaces, there is the opportunity to improve the regulation concerning FSP plan content requirements since the regulations can be more readily changed than the Act (i.e. Act changes need to go through a more rigorous process than regulation changes).

A5. Response to PAC recommendation regarding maintaining or enhancing environmental standards

Government remains fully committed to implementing FRPA in a manner that maintains or enhances environmental standards of the Forest Practices Code. Aspects of the July 2003 draft regulations have changed in response to PAC concerns.

Section 24 in FPPR enables the Minister (or a delegated decision maker) to request available information relevant to the factors that were applied in developing the results or strategies. This information is intended to help assist the plan approval process.

In response to PAC's concern about environmental equivalency, staff have prepared an Attachment that provides a comparison of environmental standards between FRPA and the Forest Practices Code.

Also, to address the issue of environmental equivalency in terms of "on-the-ground" actions, government will be monitoring how well we are meeting or exceeding environmental standards as part of the FRPA Resource Evaluation Program. This will occur over time (for example, over 5 years) as FRPA is being implemented. I ask that PAC review the FRPA Resource Evaluation Program and provide advice on its effective delivery. There may also be the need to ask the Forest Practices Board to assess delivery of the new regime regarding government's goal that FRPA achieve environmental equivalency with the Code.

A6. Response to PAC recommendation regarding public input

Opportunities for public review and comment of FSP in regulations now more closely resemble opportunities provided for FDPs under the Forest Practices Code (than occurred in July 2003 draft). This should provide more certainty to both industry and the public who are familiar with Forest Practices Code obligations. Public comments relevant to plan approval tests can be considered by the delegated decision maker responsible for approving the plan. For example, are results and strategies consistent with government objectives? Public comments that do not relate to any plan approval consideration can not be considered by the delegated decision maker when making an approval decision, however licensees may voluntarily decide to address some of these comments.

The July 2003 draft regulation had a section (that was flagged as still requiring policy discussion) where the results or strategies proposed in a Forest Stewardship Plan must be accepted unless the delegated decision maker could demonstrate they were unreasonable. The intent of proposing such a section was to promote professional reliance. There was concern, however, that the section may overly limit the authority of designated decision makers. This section has been removed. The Minister under the authority of s. 17 of the *Government Actions Regulation* could address this issue by providing direction.

The Forest Practices Code provided for independent statutory decision-makers (often the district manager). FRPA provides instead a delegated decision maker model where the Minister may delegate his/her authority with direction. The intent is to promote more consistent decisions across the province. Part 3 (s. 17-18) of the *Government Actions Regulation* provides the regulatory authority for delegation and providing direction.

A7. Response to PAC recommendation regarding accountability and responsibility

Section 108 of the Act itself enables the Minister to waive an obligation to achieve a free growing stand (or fund licensees to carry out this obligation) if the Minister is satisfied that an event is causing damage and preventing the licensees from meeting its obligation without significant extra expense. The event can not be caused by the licensee or may have occurred despite the licensee's efforts to be duly diligent.

In response to PAC's concern, the *Forest Planning and Practices Regulation* was revised to include a new section to clarify responsibilities. S. 90 exempts the holder of a Forest Stewardship Plan from achieving results and strategies if they can not be achieved due to the actions of a person who has been authorized by government.

A8. Response to PAC recommendation regarding landscape level planning

The primary planning tool that government uses to balance social, economic and environmental objectives is strategic land use plans such as Land and Resource Management Plans (LRMPs). Government remains committed to completing strategic land use plans. The objectives in cabinet approved land use plans can provide legal direction as land use objective (previously called higher level plan objectives) or provide policy advice to licensees who prepare operational plans.

Landscape level planning in support of the Forest Practices Code is described in the March 1999 *Landscape Unit Planning Guide* (LUPG). The LUPG focuses on priority biodiversity planning which consists of retention of old growth forests and wildlife trees. Landscape Unit (LU) planning under the LUPG was not intended to be another "all things considered" mini-land use plan. Rather it was primarily intended to be more of a technical plan that delivered priority biodiversity elements consistent with (or in consideration of) approved land use plans. There have been criticisms of the Forest Practices Code implementation in that LU planning for biodiversity has only been completed in a few areas. Currently, MSRM can undertake biodiversity planning as part of its Sustainable Resource Mgt Planning (SRMP) process; this is done based on priorities MSRM sets in consideration of the many planning challenges being faced.

To address concerns that priority biodiversity elements were not being delivered in a timely manner:

- in support of FRPA, MSRM has prepared a provincial aspatial old growth order which will specify the minimum amount of old forests to retain based on the policy direction in the LUPG; and
- the FRPA regulations specify the minimum requirements for wildlife tree retention.

These two steps are intended to provide legal objectives for the retention of old growth and wildlife trees for all crown forest lands, whereas currently relatively few crown forest lands have legal objectives for these values.

Objectives enabled under FRPA (e.g. ungulate winter ranges, scenic areas and wildlife habitat areas) are an important aspect of FRPA but these objectives do not have to be delivered through landscape level planning. Also, it should be pointed out that:

- A wildlife objective in the *Forest Planning and Practices Regulation* addresses areas where ungulate winter range and wildlife habitat area designations are not complete,
- MOF is developing a provincial order to provide objectives for scenic areas that do not have area-specific Visual Quality Objectives (VQOs) to support FRPA.

A9. Response to PAC recommendation regarding powers of intervention

Sections 77 and 77.1 of FRPA introduces new powers of intervention that were not present under the Forest Practices Code. The July 2003 draft regulations that PAC reviewed did not address this new power. The regulations (e.g. s. 93 in the *Forest Planning and Practices Regulation*) now clarify responsibilities with respect to payment of expenses incurred to carry out measures for specified types of intervention orders.

A10. Response to PAC recommendation regarding balancing resource objectives

PAC raised concerns that the objectives set by government in the July 2003 draft *Forest Planning and Practices Regulation* were sometimes too general. The inclusion of a timber objective along with a set of factors in the Schedule that apply to the objectives are intended to provide clearer direction.

Objectives for non-timber values (except cultural heritage resources) in the *Forest Planning and Practices Regulation* include the phrase "without unduly reducing the supply of timber". The intent of the timber objective and the phrase for non-timber objectives is to deliver FRPA following the same timber supply impact limits that guided delivery of the Forest Practices Code. For example, they guide the setting of objectives enabled in the regulations such as for ungulate winter ranges and scenic areas. The phrase "without unduly" is also intended to guide industry when preparing results or strategies of what government's expectations are with respect to impacts; this in turn also guides delegated decision-makers who approve FSPs. The timber objective also guides approval of FSPs when s. 27 regarding "balancing objectives" is applied.

A11. Response to PAC recommendation on occupational health and safety

Equivalent wording is now in the *Forest Planning and Practices Regulation* under Part 1 (Interpretation) in section 2(4) that uses similar language as existed under Forest Practices Code. This did not occur in the July 2003 draft regulations that PAC reviewed. The wording maintains precedence of *Workers Compensation Act* and its regulations over FRPA regulations should there be conflict. The Forest Practices Code did not include a plan content requirement with respect to safety—so a new objective set by government that addresses safety would represent a new obligation if introduced in FRPA. Therefore no additional objective or practices requirement beyond s. 2(4) exists in the regulation. Worker health and safety are critical concerns and FRPA will in no way undermine occupational health and safety requirements that are appropriately regulated under the *Workers Compensation Act*.

B. Response to PAC recommendations regarding FRPA implementation

B1. Response to PAC recommendation on training

I fully agree with PAC's recommendation and strongly commit to provision of on-going FRPA training opportunities past March 31, 2004. Training needs to be on-going with opportunities provided to get feedback and improve delivery to meet the needs of clients. Although we face the challenge of doing this with limited staff and resources next fiscal year, it is simply too important not to do. The Ministry will build on the detailed training plan it now has for delivering FRPA training this fiscal year to address on-going needs for training.

B2. Response to PAC recommendation regarding ministries meeting new mandates

There has been, and continues to be, a very close working relationship between Ministry of Forests (MOF) and Ministries of Water, Land and Air Protection (MWLAP) and Sustainable Resource Management (MSRM) on the development and implementation of FRPA. We have also been working closely with several other resource agencies to help ensure their interests and concerns are addressed. We are committed to ensuring these close relationships continue and improve. Each agency is aware of its responsibilities in helping to ensure the successful delivery of FRPA including the establishment of objectives critical to its success.

Provincial and Regional Inter-Agency FRPA Implementation Teams meet regularly to address issues including the need to establish clear objectives. An interagency FRPA-focused Joint Steering Committee and Joint Management Committee have helped shape the new Act and the regulations, and will continue to meet to address and resolve inter-agency management issues. Agencies with FRPA compliance and enforcement responsibilities are working together to clarify roles.

One key feature of FRPA that is different than the Forest Practices Code is that FRPA is a delegated decision maker model (versus a model based on independent statutory decision makers). Under FRPA, the role of Ministers is much greater and includes setting the direction for exercise of authority of agency staff under FRPA. This is a way to help ensure agency responsibilities under FRPA do get effectively delivered.

B3 Response to PAC recommendation regarding government core services

Resource agencies need to be customer focused. In that regard, the Provincial and Regional Inter-Agency FRPA Implementation Teams have been meeting regularly to help ensure key staff are available to support FRPA and receive appropriate training. Key staff in MOF and MWLAP have been assigned the task of supporting FRPA implementation.

B4. Response to PAC recommendation regarding supporting innovation

I agree with PAC that it is very important to foster and promote responsible innovation. Although the construct of FRPA is centred around defining results and leaving it up to licensees to be innovative in terms of delivering the results (rather than the more rules-based Forest Practices Code which regulated "how to" do things), we can do more. I therefore ask PAC if they could put their collective minds around this important issue and provide me with specific advice on ways we should do more to promote innovation.

B5. Response to PAC recommendation regarding support mechanisms

I agree with PAC that support mechanisms that guide implementation of FRPA is important. I would appreciate PAC's advice on key mechanisms they feel are not in place or need to be improved as we move into implementation.

With respect to PAC's reference to compliance and enforcement (C&E), government continues to be committed to enforcing FRPA with tough fines for non-compliance. FRPA provides licensees with far more freedom to manage how to achieve results, but if the results are not achieved, C&E action will be taken. Having said that, government needs to take an internally consistent approach to C&E and to work with licensees to ensure a common understanding of the C&E regime. One immediate action undertaken in this regard is the development of a FRPA training module on C&E. I also understand that we need to balance our commitments for an effective C&E program with proactive assistance, particularly for smaller operators, on effective ways that government's objectives can be delivered. In that regard, I would appreciate hearing from PAC on their ideas on what should be done to better strike that balance.

B6. Response to PAC recommendation on monitoring and managing change

FRPA and the regulations can be improved over time as we gain implementation experience. I agree with PAC that some change in the legislation is inevitable, but this should be managed change. Changes to the Act should be done carefully and infrequently, whereas changing the regulations can be accomplished more readily. The Act and the regulations were in fact designed with this in mind. Any changes should be based on FRPA implementation experience and so any key needs for change should hopefully not be needed until Fall 2004. However, if critical changes are identified prior to that, I am prepared to consider them.

To help facilitate managed change, government is developing a FRPA Resource Evaluation Program. As I mentioned in my response in A5, I would appreciate that PAC review the Program and provide advice on its effective delivery.

B7. Response to PAC recommendation on communication

Objectively and fairly communicating FRPA to forest and range practitioners and workers, First Nations, local government, stakeholders including the environmental community and tourism interests, and the general public is a key task ahead. We also need to communicate FRPA to the international community including our markets for forest and range products. I am therefore now asking PAC for their ideas on how to do this effectively including identification of key forums or specific meetings where it is important that FRPA be addressed. We will share with PAC key government communication messages regarding FRPA, seek their ideas on how to improve communication, to help ensure it is balanced and fair, and what audiences need to be reached.

Attachment A

Comparison of Environmental Standards
between
Forest and Range Practices Act (FRPA) and Forest Practices Code (FPC) regime
with respect to Forest Planning and Practices

1. Soils

(a) Soil disturbance

FPC: Soil conservation standards are described in FPC Act and practice regulations. A silvicultural prescription was required to address soil conservation issues for each harvested site.

FRPA: An objective set by government is to conserve the productivity and hydrologic function of soils. Soil disturbance limits and permanent access structure limits are practices requirements specified in regulation. Licensees can adopt these requirements or propose results or strategies in their FSP provided that they are consistent with the objective in regulation for soils.

(b) Landslides

FPC: Plan content requirements state that a terrain stability field assessment must occur before forest development activities proceed on potentially unstable terrain, and that the recommendations of the assessment are to be followed.

FRPA: A practice requirement exists that a primary forest activity must not cause landslides that have a material adverse affect on specified resource values.

2. Visual quality

FPC: Scenic areas could be established through land use plans or by the MOF. MOF can establish Visual Quality Objectives (VQOs) in scenic areas. The FDP was required to describe strategies to conserve visual values in scenic areas, or to meet VQOs where established. Where VQOs established, a visual impact assessment was required.

FRPA: Existing scenic areas and VQOs under FPC are grandparented into FRPA. New scenic areas may be designated by MSRM and VQOs within scenic areas can be established by MOF. A provincial order is being prepared by MOF to address objectives for scenic areas without area-specific VQOs. This will trigger requirement for FSP to provide results or strategies for all scenic areas (i.e. even if VQOs have not been established). Area-specific VQOs override the provincial order.

3. Timber

a) Timber supply

FPC: Implementation of the FPC was guided by government's timber supply impact policy. This policy was considered by agencies before designating areas (such as wildlife habitat areas, ungulate winter range, scenic areas) and establishing objectives for these areas. Also, statutory decision makers could consider this policy under the "adequately manage and conserve" approval test for FDPs.

FRPA: An objective set by government includes maintaining or enhancing timber supply; objectives set by government for several non-timber values mention that delivery should not unduly reduce the supply of timber. These provisions are intended to provide a connection with government policy on timber supply impact limits. This is needed since the "adequately manage and conserve" approval test under the FPC no longer exists under FRPA. The language in various objectives in regulation referring to timber supply helps to maintain a balance between timber and environmental values. This balance was reflected in the FPC approval test wording of "adequately manage and conserve".

b) Forest health

FPC: An assessment of forest health risks was required for the area of an FDP. The FDP was required to propose strategies to address risks disclosed by the assessment.

FRPA: The Act itself requires that licensees prepare a forest health strategy within a timber supply area (a similar requirement exists for tree farm licensees under *Forest Act*) and that the strategies and measures be carried out.

c) Silviculture

FPC: A regulation described the practices and standards to be employed by a licensee in meeting obligations to establish a well stocked, healthy and commercially valuable stand and trees, and maintain it to free growing.

FRPA: The FSP must state the stocking standards to be achieved including regeneration date and free-growing date. When specifying stocking standards, licensees may consider the factors set out in the Schedule of the regulations.

4. Water

FPC: FDPs in community watersheds are required to be consistent with provisions in a watershed assessment, or provide rationale why they are not consistent. Practices regulations governed how activities were to be conducted to protect water quality. Water supply intakes and water delivery infrastructure licensed under the *Water Act* are protected.

FRPA: Practices requirements in regulation protect the quality of water for human use where the water is diverted for human consumption by a licensed waterwork. All licensed

waterworks are protected from damage. FSPs must provide results or strategies consistent with water quality objectives for community watersheds.

5. Fish – Riparian Management

FPC: Streams, wetlands and lakes are required to be classified according to a regime described in guidebooks. FDPs are required to show riparian class for these areas and the general objectives for riparian management. Widths of riparian zones are set in regulation. Retention levels are proposed in guidebooks. Practices regulations address stream bank protection measures and temperature sensitive streams.

FRPA: The regulation specifies practices requirements regarding the classification of stream, wetland and lake riparian areas (e.g. widths of riparian reserve zones and riparian management zones), and activity restrictions in various zones of riparian areas. The FSP may include results or strategies for riparian management provided they are consistent with the objective set by government for riparian areas, which when approved would replace the one or more of the above mentioned riparian practices requirements. Regulations specify other riparian-related practices requirements for stream crossings, safe fish passage, the protection of fish and fish habitat, temperature sensitive streams and other considerations.

6. Wildlife

FPC: FDPs must be consistent with objectives for ungulate winter range (UWR) and any Higher Level Plan (HLP) objectives for wildlife. Forest practices must be consistent with general wildlife measures for wildlife habitat areas (WHAs). Other wildlife concerns could be captured under the "adequately manage and conserve" plan approval test.

FRPA: FSPs must be consistent with objectives for UWR, WHAs and any land use objectives for wildlife (areas established under FPC are grandparented into FRPA). The FSP must also address other wildlife that the Minister of MWLAP identifies as being subject to the objective set in regulation for wildlife. Forest practices must be consistent with any general wildlife measures for WHAs, UWRs, species at risk, regionally important wildlife and specified ungulate species.

7. Biodiversity

a) Old growth representation

FPC: Objectives for old growth representation were to be spatially set in higher level plan objectives (primarily via landscape level planning) through establishment of Old Growth Management Areas (OGMAs). FDPs must be consistent with higher level plan objectives for OGMAs. Currently only a small percentage of the province have legal old growth objectives.

FRPA: Objectives set by government for old growth representation will be aspatially established for entire province by landscape unit through a MSRM order. The order will

apply to all landscape units where OGMAs are not in place (OGMAs under FPC are grandparented into FRPA). FSPs must be consistent with objectives set by government including the provincial OG order or objectives for OGMAs. The provincial order will result in 100% of province's crown forests having legal old growth objectives.

b) Seral stage representation

FPC: If needed, objectives for seral stage representation (e.g. early or mature seral) were to be established in higher level plans based on strategic land use or landscape level planning. FDPs must be consistent with these objectives where they have been set. Currently only a small percentage of the province have objectives for seral stage representation.

FRPA: If needed, objectives can be set by MSRM through land use objectives. Existing higher level plan objectives for seral stage representation are grandparented into FRPA. FSPs must be consistent with these objectives set by government.

c) Temporal and spatial distribution of cutblocks

FPC: Objectives can be set in higher level plans, and if so, FDPs are required to be consistent with the objectives. Practices requirements (green-up and adjacency) and limitations on cutblock size are in place where higher level plans do not address temporal and spatial distribution of cutblocks.

FRPA: Objective set by government for biodiversity encourage timber harvesting to be carried out in a manner that resembles the temporal and spatial pattern of natural disturbance. Default practice requirements address green-up, adjacency and cutblock size similar to FPC. A land use objective can still address this biodiversity element and would override the objective and default specified in the regulation.

d) Wildlife trees

FPC: Higher level plan objectives for wildlife tree retention could be established. If so, an FDP must be consistent with these objectives. In absence of HLP objectives, an FDP was still required to specify objectives for wildlife tree retention. The Landscape Unit Planning Guide provided advice on amount of wildlife tree retention.

FRPA: An objective set by government for biodiversity and wildlife is to retain wildlife trees. Default practices requirements specify the amount of wildlife trees to be retained. Alternative results or strategies may be proposed. A land use objective can still address wildlife tree retention and if so this would override the objective and default specified in the regulation.

e) Coarse woody debris

FPC: An FDP is required to specify objectives for coarse woody debris retention.

FRPA: A practices requirement exists; there is no plan content requirement.

8. Recreation resources

FPC: FDPs must be consistent with objectives for recreation sites and trails. Practices requirements protect recreation features (as a resource feature). The FDP must also be consistent with any higher level plan objectives related to recreation.

FRPA: FSPs must be consistent with objectives for recreation sites and trails. Practices requirements protect recreation features (as a resource feature) from damage. FSPs must be consistent with any higher level plan objectives related to recreation.

9. Resource features

FPC: Regulations require that known resource features to be protected.

FRPA: Regulations require that resource features not be damaged.

10. Cultural heritage resources

FPC: Cultural heritage resources regulated under *Heritage Conservation Act* must be managed consistent with the requirements of that Act. Other cultural heritage resources are protected as a resource features where made known.

FRPA: Cultural heritage resources regulated under *Heritage Conservation Act* must be managed consistent with the requirements of that Act. FSPs must provide results or strategies consistent with objectives set by government for other cultural heritage resources specified in the regulation. Forest practices also must not damage a cultural heritage resource covered under the requirements of a resource feature.